

Remarks

Claims 1, 17, 24, 26, 27 and 34 are amended to include the production of industry-specific quality metrics. For instance, for the industry of quantifying and understanding web-page viewing, industry-specific quality metrics include the focal value. Support for the amendment can be found in the specification including page 13, line 12 through page 18, line 7. The Schuetze application cited by the examiner does not provide for industry-specific quality metrics, an example of which is focal value. Instead, the Schuetze reference discloses a simple dot product to compare data. The dot product is a general method of comparing data and is not an industry-specific quality metric.

In contrast, the focal value of the present invention provides the worth of a cluster of data points as related to a particular reference, as described at page 14, line 19 through page 15, line 7. In other words, the data is provided in a format tailored to a particular industry. Other disclosed industry-specific quality metrics also provide information that is tailored for the industrial-specific application. *See e.g.*, page 15, line 8 through page 17, line 13.

Claims 2-16, 25 and 28-33 are dependent from claims 1, 24 and 27 respectively.

Claim 23 is written in a means-plus-function format. The Schuetze patent application cited by the examiner as anticipating claim 23 does not disclose or suggest the means for visualization disclosed in the specification. This means for visualization may, *e.g.*, include the profiler dashboard module, whose description appears at page 11, lines 9-15 and in Figures 1 and 3-5. The profiler dashboard module provides information to a user that a user would want in order to decide how to drill down further into population data, thus presenting an advantage over the cited art. The claim is also amended to more particularly claim the invention.

Claims 35-38 are newly added claims. There is a unity of invention with claim 24. Support for the claims is found throughout the specification, *e.g.*, at page 10, line 19 through page 11, line 22. These claims are not anticipated by Schuetze, as the Schuetze reference does not describe the four modules found in new claim 35 or their equivalents. These four modules include a parameter selector module, a profiler dashboard module, a segment visualizer module and a segment analyzer module.

The parameter selection module is described at page 11, lines 1-7. This module allows a user to select and alter statistics reported by the invention. The profiler dashboard module is described at page 11, lines 8-15. This module allows a user to view selected aspects, clusters and segments of profile data. The segment analyzer module is described at page 11, lines 16-19. The module allows a user to select specific data, clusters and segments that the user wishes to view. The segment visualizer module is described at page 11, lines 20-22. The module allows a user to interactively review characteristics and other relationships across segments of clusters. These modules are also described in the figures. Thus, the four modules described above, which are not suggested by Schuetze, present distinct advantages over the prior art.

Claims 39-41 are also newly added claims. There is a unity of invention with claim 24. Support for the new claims is found throughout the specification *e.g.*, at page 10, line 19 through page 12, line 6. These claims are not anticipated by Schuetze, as the Schuetze reference does not describe any of the statistics enumerated in claim 39. The statistics of lift, value ratio, revenue difference, support, impact, baseline value and focal value are statistics that enable a user to review and understand profile data. These statistics are discussed in the specification from page 14 line 19 through page 17 line 13.

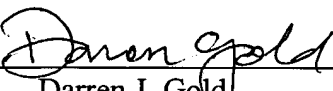
Accordingly, the pending claims are neither anticipated by nor obvious in light of the references of record.

CONCLUSION

Applicants respectfully submit that all claims are in proper form and condition for patentability, and requests a notification of allowance to that effect. **Outside the fee for the Extension of Time Petition and fee for additional claims**, it is believed that no other fee is due at this time. Should any other fee be required for any reason related to this document, however, the Commissioner is hereby authorized to charge any additional fees that may be due, including extension fees, or credit any overpayment to our Deposit Account No. 08-3038 (Order No. 00982.0003.NPUS00).

Respectfully submitted,

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